

Appn. No.: 10/010,630  
Amendment Dated: March 10, 2005  
Reply to Office Action of: September 13, 2004

MAT-8198US

**Remarks/Arguments:**

By this Amendment, Applicants have amended claims 1, 3-6, 8, 12, 14-17, 28, 29, 32, 34-40, 42-44, and 47. Applicants have cancelled claims 2, 7, 9-11, 13, and 33. And Applicants have added new claims 49-82. Claims 1, 3-6, 8, 12, 14-32, and 34-82 are pending.

**Objection to the Specification**

The Examiner has requested a new application with lines double spaced on good quality paper. Applicants have therefore attached a substitute copy of the originally filed specification with double spacing as requested by the Examiner.

**Claim Objections**

Claims 4, 5, 10, 11, 28, 34-38, 44, and 47 are objected to under 37 CFR 1.75(c) as being in improper form. Applicants have either amended or cancelled these claims to overcome the basis for the Examiner's claim objections.

**Rejections Under Section 103**

Claims 1, 4, 5 and 46 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn and Bennett; claims 2 and 3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn and Bennett and further in view of Iida; claims 6, 7, 11, 17, 20-22, and 32-34, 47 and 48 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn and Otsuka; claims 12-16, 18, 23, and 35-39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn and Otsuka and further in view of Carley; Claims 19, 24, and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn and Otsuka and further in view of Koyama; claims 28-31 and 40-43 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn and Otsuka and further in view of Yokota and Carley; claims 26 and 27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn and Otsuka and further in view of Yokota and Fukunaga; claims 44 and 45 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn and Otsuka and further in view of Nishigaya; claim 8

stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn, Otsuka and Yokota; claim 10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn, Otsuka and Yokota and further in view of Iida; and claim 9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Quinn, Otsuka, Koyama and Iida. Based on this Amendment, Applicants respectfully traverse the Section 103(a) rejections.

Claims 1, 6, 8 and 32 are independent claims. Claims 3-5, 46, and 50-52 are dependent on claim 1. Claims 12, 14-31, 44 and 47 are dependent on claim 6. And claims 34-43, 45 and 48 are dependent on claim 32.

Turning first to independent claim 1, it is directed to a memory media, including the following features:

- a plurality of directories at a directory level, each of the directories limited to storing files of a respective one of a plurality of file formats, and
- a further directory at the directory level, the further directory for storing files in other than the plurality of file formats.

It is Applicants' contention that the memory media defined by claim 1 is patentably distinguished from the references of record based on the requirement that it includes a plurality of directories at a directory level, with each of the directories limited to storing files of a respective one of a plurality of file formats, and a further directory at the directory level, where the further directory is for storing files in other than the plurality of file formats. This feature is herewith generally referred to as the "Directory Features" of Applicants' claimed invention. It is Applicants' position that this feature is neither taught nor suggested in the references of record, because the references of record do not teach or suggest separate directories as defined by Applicants' claim 1 to which claims 3-5, 46, 50 and 51 depend. Applicants' amendment to claim 1 more specifically defines and distinguishes the plurality of directories and the further directory so that they are not taught or suggested in the references of record.

Independent claims 6, 8 and 32 and the claims dependent thereon, include in a similar manner the Directory Features of Applicants' claimed invention. These claims are likewise patentably distinguished from the references of record.

The Quinn Patent relates to an edit command delegation (ECD) utility that provides a user with the ability to edit an electronic file in a creator application program while the electronic file is open in a separate viewing application program operable only for viewing the electronic file. In response to a user input to edit the electronic file, the ECD utility opens the electronic file and reads an application identification tag contained within the content of the electronic file. The Office Action's comments with respect to the Quinn Patent, in general, relate to the ECD utility, but it is Applicants' contention that the Quinn Patent does not teach or suggest the Directory Features of Applicants' claimed invention.

The Bennett Patent, in general, relates to a system which includes a relational database management system (RDBMS), and methods for maintaining integrity between "designed documents", which may be created under different operation systems and one or more information tables of the system. The system provides each field of a table with a unique identification field for tracking the field regardless of restructuring changes which may be made to the table by various clients. More specifically, the Office Action has cited the Bennett Patent with respect to a method for free-form storage in management as described, for example, at column 16, lines 50-59 of the Bennett Patent. But Applicants respectfully submit that even if one skilled in the art were to combine the Bennett and Quinn Patents, the result would not be the memory media defined in Applicants' claim 1 which has a plurality of directories at a directory level, with each of the directories limited to storing files of a respective one of a plurality of file formats, and a further directory at the directory level which stores files in other than the plurality of file formats. Lacking these features, the Quinn and Bennett Patents either separately or in combination do not anticipate or render obvious Applicants' claimed invention as set forth in claim 1.

It is Applicants' contention that independent claims 6, 8 and 32 in a similar fashion include the Directory Features and are likewise patentably distinguished from the references of record.

The Iida Patent, in general, concerns a recording method and apparatus for recording data that is continuously input into a nonvolatile memory records wherein the data is discretely in a plurality of blocks under control of file management data. The Iida Patent has been cited with respect to the use of the same layer on a directory tree and in this regard, the Office Action focuses on Figures 25 and 26, illustrating directory change in a high speed process, as well as the discussion of such figures in the Iida Patent. Applicants, however, respectfully submit that the Iida Patent does not teach or suggest that the Directory Features of Applicants' claimed invention. Applicants' claimed invention is patentably distinguished from the Iida Patent.

The Otsuka Patent, in general, relates to a storage management system for a memory card, which has a storage area divided into a plurality of storage units having a predetermined capacity, and manages a storage of information in every storage unit. The Otsuka Patent has been cited with respect to the forming of directories and the use of data storage areas and more specifically a storage management system. But Applicants contend that the Otsuka Patent does not teach or suggest the Directory Features of Applicants' claimed invention and is therefore patentably distinguished from Applicants' claimed invention.

The Carley Patent relates, in general, to system management and the monitoring of user stations for notification when multiple users attempt to alter the same data. An instruction for initiating a load process is received from a user station, and data is downloaded from the one of the user stations to the server. A determination is made whether another load process is being concurrently executed by another user station. If it is determined that a load process is being concurrently executed, a notification is sent to the user station. More specifically, the Carley Patent has been cited with respect to the use of files attached to electronic mail relative to a development tools framework discussed in the Carley

Patent with respect to Figure 17. Applicants, however, submit that there is no teaching or suggestion in the Carley Patent of the Directory Features of Applicants' claimed invention. On this basis, Applicants' claimed invention is patentably distinguished from the Carley Patent.

The Koyama Patent, in general, relates to a still picture filing system including a printer unit, a picture processing block, a thinning and compression/expansion processing block, a storage unit, and a system control which are connected through a bus line. The Office Action focuses on the discussion in the Koyama Patent concerning file expansion indexes used in a recording operation in the still picture filing system of the Koyama Patent. But nowhere in the Koyama Patent is there any teaching or suggestion of the Directory Features of Applicants' claimed invention.

The Fukunaga Patent, in general, relates to an image collector/transmitter which collects images from image keeping locations. Position information indicating the keeping location of image data is managed, and when a print order is issued from an external apparatus, the image data for the print order is collected in accordance with the managed position information, and the collected image data and a print request for the print order are transmitted to a printer controller. More specifically, the Fukunaga Patent has been cited with respect to the extraction of files in the EXIF or JPEG formats. However, the Fukunaga Patent does not rectify the deficiencies heretofore discussed with respect to the other references of record concerning the Directory Features of Applicants' claimed invention.

The Nishigaya Patent relates, in general, to a personal communication service distribution control system which provides a personal communication service in a combination of different networks based on the same personal identification without requiring person originating information to be aware of the type of terminal used by a transmitting person. In particular, the Nishigaya Patent has been cited with respect to the use of portable information terminals and portable telephones. But the Nishigaya Patent does not teach or suggest the Directory Features of Applicants' claimed invention.

Appn. No.: 10/010,630  
Amendment Dated: March 10, 2005  
Reply to Office Action of: September 13, 2004

MAT-8198US

The Yokota Patent, in general, relates to a data communication system for distributing music data files between a server and a client removably connected to the server. The system transfers music data files and corresponding management data from a client to a server. The server then determines whether the music data files were previously stored in the server on the basis of the corresponding management data transferred from the client and a management data file in the server. The Yokota Patent, however, does not teach or suggest a memory media or a portable information terminal as defined in Applicants' claimed invention which requires the Directory Features as described above. Thus, the Yokota Patent does not overcome the deficiencies heretofore discussed with respect the other references of record.

Based on the foregoing remarks and amendments to the claims, Applicants respectfully submit that the Section 103(a) rejections to claims 1, 3-6, 8, 12, 14-32, and 34-48 should be withdrawn for the reasons noted above.

**Newly Added Claims**

By this Amendment, Applicants have added new claims 49-82. The addition of these claims is not the addition of new matter. It is Applicants' position that these claims are supported by the disclosure in the originally filed application. In this connection, Applicants, for example, point to the disclosure of the originally filed application at page 8, line 41 to page 9, line 35.

Of the new claims, claims 50-51 are dependent on claim 1 and in view of the above discussion, are patentably distinguished from the references of record based on the requirement of Directory Features.

Of the new claims, claims 49, 52-57, 59, 65, 71 and 77 are independent claims. Each of these independent claims, and likewise the claims dependent thereon, include features neither taught nor suggested in the references of record. Thus, Applicants submit that these newly added claims are patentably distinguished from the references of record.

Appn. No.: 10/010,630 MAT-8198US  
Amendment Dated: March 10, 2005  
Reply to Office Action of: September 13, 2004

In view of the foregoing remarks and amendments, Applicants respectfully submit that claims 1, 3-6, 8, 12, 14-32, and 34-82 are in condition for allowance. Reconsideration and allowance of all pending claims are respectfully requested.

Respectfully submitted,

*Daniel N. Calder*

Lawrence E. Ashery, Reg. No. 34,515  
Daniel N. Calder, Reg. 27,424  
Attorneys for Applicants

LEA/dlm/fp

Dated: March 10, 2005

P.O. Box 980  
Valley Forge, PA 19482  
(610) 407-0700

The Commissioner for Patents is hereby authorized to charge payment to Deposit Account No. **18-0350** of any fees associated with this communication.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on:

March 10, 2005

*Fran Petruccio*

MJC\_I:\MAT\8198US\AMEND02.DOC